

**UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

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VASILI TSERETELI, and VASZURELE LTD.
on behalf of themselves and all others similarly
situated,

Plaintiffs,

No. 08-cv-10637 (LAK)

-against-

ECF Case

RESIDENTIAL ASSET SECURITIZATION
TRUST 2006-A8, CREDIT SUISSE SECURITIES
(USA) LLC, MOODY'S INVESTORS SERVICE,
INC., and THE MCGRAW-HILL COMPANIES, INC.

Defendants.

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**DECLARATION OF JAMES A. HARROD IN FURTHER SUPPORT
OF LEAD PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

I, James A. Harrod, declare, under penalty of perjury, as follows:

1. I am a member of the law firm Wolf Popper LLP ("Wolf Popper"), counsel for Lead Plaintiff Vaszurele Ltd. ("Plaintiff" or "Vaszurele")¹, in the above-captioned action, and am admitted to the Bar of the State of New York and the Bar of the United States District Court for the Southern District of New York.

2. I submit this Declaration in further support of Lead Plaintiff's Motion for Class Certification.²

¹ Any capitalized terms undefined herein shall have the meanings assigned in Lead Plaintiff's accompanying Memorandum of Law.

² This Declaration contains "Confidential" material pursuant to the October 25, 2010 Stipulation and Order for the Production and Exchange of Confidential Information (Dkt. No. 74). A redacted version of this Declaration is being filed through ECF as discussed in Lead Plaintiff's accompanying Motion to File Declaration and Certain Exhibits Under Seal.

Deposition of J.P. Morgan Chase Bank, N.A.:

3. On February 18, 2011, pursuant to Rule 30(b)(6), the deposition of Claire Leaworth, who was designated by J.P. Morgan Chase Bank, N.A. (“JPM”), was taken by Defendant’s attorneys in this case. A copy of relevant excerpts from the deposition transcript is attached as Exhibit A hereto (“Confidential”).

4. REDACTED

5. REDACTED

6. REDACTED

REDACTED

Deposition of Vasili Tsereteli on Behalf of Vaszurele Ltd.:

7. On February 4, 2011, the deposition of Vasili Tsereteli, of Vaszurele, was taken by Defendant's attorneys in this case. A copy of relevant excerpts from the deposition transcript is attached as Exhibit C hereto ("Confidential").

8. REDACTED

9. REDACTED

10. REDACTED

Additional Exhibits In Support of the Motion:

12. Attached hereto as Exhibit D is a copy of Credit Suisse's March 4, 2011 Objections and Responses to Lead Plaintiff's Second Requests for Production of Documents.

13. Attached hereto as Exhibit E is a copy of the April 8, 2011 Rebuttal Report of Professor Steven P. Feinstein, PH.D., CFA.

14. Attached hereto as Exhibit F is a copy of relevant excerpts from the transcript of the deposition of Walter N. Torous taken on March 15, 2011.

15. Attached hereto as Exhibit G is a copy of relevant excerpts from the transcript of the confidential portion of the deposition of Walter N. Torous taken on March 15, 2011 ("Confidential").

16. Attached hereto as Exhibit H is a copy of the relevant excerpts from the Complaint, dated February 11, 2011, in *SEC v. Abernathy*, No. 11-CV-1308 (C.D. Cal.).

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct, this 8th day of April, 2011.

s/ James A. Harrod
James A. Harrod